

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY  
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**STATEMENT INSTEAD OF REDACTION**

The following exhibits to the Declaration of Timothy M. Frey (ECF No. 457) submitted in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment have been filed under seal in accordance with Local Rule 5.6(d) as follows:

ECF No.	Exhibit No.	Document Description	Reason for Filing Under Seal
457-42	171	October 11, 2023 Deposition Transcript of Dennis Montgomery	Transcript designated "Confidential"
457-48	177	August 2, 2023 Deposition Transcript of Ret. Gen. Michael Flynn	Transcript designated "Confidential"
457-51	180	August 9, 2024 Deposition Transcript of Douglas Bania	Transcript designated "Confidential"
457-124	253	Declaration of Dr. John Berger	Declaration incorporating expert report designated "Confidential"

457-125	254	Declaration of Dr. Kevin Keller	Declaration incorporating expert report designated “Highly Confidential – Attorneys’ Eyes Only”
457-126	255	Declaration of Tammy Patrick	Declaration incorporating expert report designated “Confidential”
457-127	256	September 28, 2023 Deposition Transcript of Antonio Mugica	Transcript designated “Confidential”
457-128	257	September 27, 2023 Deposition Transcript of Antonio Mugica	Transcript designated “Confidential”
457-170	264	August 12, 2024 Deposition of Dr. Christopher James	Extensive discussion of expert report designated “Highly Confidential – Attorneys’ Eyes Only”
457-171	265	Expert Rebuttal Report of Christopher James	Report is designated “Highly Confidential – Attorneys’ Eyes Only”
457-172	266	September 13, 2023 Deposition Transcript of Roger Piñate	Transcript designated “Confidential”

Dated: December 13, 2024

Respectfully submitted,

/s/ J. Erik Connolly

J. Erik Connolly (admitted *pro hac vice*)

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